

# **EXHIBIT 4**

**From:** Moran, John S. <JMoran@mcguirewoods.com>  
**Sent:** Sunday, June 11, 2023 9:16 PM  
**To:** Elliker, Kevin  
**Cc:** Francisco, Michael  
**Subject:** RE: Follow-up from June 1 meet and confer in Doe v. Mast, (W.D.Va.)

**Caution: This email originated from outside of the firm.**

Kevin,

My apologies for not getting back to you on Friday. Michael and I have both had travel and the press of unrelated matters that have occupied our time. Unfortunately, that will continue into this coming week as well. That said, I will work with our team and our clients to get back to you as soon as we can, and I expect that I will be able to respond in writing by Wednesday.

On the broader issue of document production, I do believe we have intractably different views of what is reasonable at this stage of the litigation. But we are working to see if there is a cost-effective way that we can close out responses on particular requests.

Regards,

**John S. Moran**

Partner

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**From:** Elliker, Kevin <KElliker@huntonak.com>  
**Sent:** Tuesday, June 6, 2023 2:42 PM  
**To:** Moran, John S. <JMoran@mcguirewoods.com>  
**Cc:** Eckstein, Maya <meckstein@hunton.com>; Powell, Lewis <lpowell@hunton.com>; King, Jeremy <JKing@hunton.com>; Damon.Porter@lw.com; Ehson.Kashfipour@lw.com; Francisco, Michael <MFrancisco@mcguirewoods.com>; Tagert, Stephen <stagert@mcguirewoods.com>  
**Subject:** Follow-up from June 1 meet and confer in Doe v. Mast, (W.D.Va.)

**\*\*EXTERNAL EMAIL; use caution with links and attachments\*\***

John,

Please find attached a letter memorializing and following up on our meet and confer last week.

Thanks,

Kevin



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